

## **EXHIBIT G**

**From:** R. Douglas Gentile [dgentile@dfrglaw.com]  
**Sent:** Thursday, November 04, 2010 11:23 AM  
**To:** Oertle, Heidi; ddoan@haltomdoan.com; Michael Hopkins  
**Cc:** Krasovec, Joseph; John Greer  
**Subject:** RE: McCune v. Graco

Heidi:

To further follow up with you, I have gone to great lengths to limit the material we believe we need to ensure that any potential download is not corrupted, distorted, deliberately falsified, or otherwise made to produce limited or bogus data. Here are the documents we must have before we can discuss the details of a proposed court ordered protocol:

Each document which is necessary to identify, access, read, verify and interpret all of the data in the RCM in the subject vehicle (vehicle) including, but not limited to, pre-collision, near collision, collision and post-collision data, vehicle performance data, vehicle condition data, component performance and condition data, timing data, occupant classification data, seat use and position data, electronic stability control data, driver control data, fault data, diagnostic data, kinematics data, and restraint use and performance data, acceleration data, delta v, braking, timing of the impact, timing of any order to deploy, the actual time of deployment, the closing of sensors data, sensor overlap time, engine speed, warning light status, ignition cycle information, presence of orders to deploy including multilevel deployments, the deployment criteria which were met, including but not limited to acceleration, displacement, energy, jerk and/or speed. This includes Accident Avoidance sensors, Back Up Sensors, collision notification data and logs. This applies to any recorded data regardless of the means used to record it.

The memory map, template or other document, regardless of the terminology used to name it, which identifies the type of data in every memory address and location in all devices which store data.

Each document necessary to read and interpret the data in every memory address and location in every device which records any data in the vehicle.

Each document necessary to identify the actual conditions which determine each item of data that will be written to each address and location in every device which records any data in the vehicle. An example of an "actual condition" would be the actual ohm measurements which would cause a deployment loop discontinuity fault code to be set.

The specifications for the EDR components and the internal RCM components which have a function in creating the data which is stored in the EDR memory. This includes the specifications for the accelerometers, computer chips, and transistors.

The specifications for the components outside of the RCM which have a function in creating the data which is stored in the EDR memory. This includes the specifications for the components which measure such physical conditions as vehicle speed, engine speed, belt use, throttle position and seat track position.

The specifications for all devices used by Autoliv or its suppliers to download and interpret all data in every device which records any data in the vehicle.

The operator's manual for all devices used to download and interpret the data in the

EDR.

The worksheets and decoding documents used by Autoliv and its suppliers to decode the downloaded data from any data storage or recording device in the vehicle.

The Failure Modes and Effects Analysis (FMEA) for the EDR.

The documents required to determine the time and order in which any specific item of data is written to any form of memory, including buffers.

The documents which encompass, embody, record or refer to any information regarding the potential for one or more items of recorded data to be incorrect. For clarification, an example would be any document which indicates that data relating to seat belt use could be inaccurate or unreliable.

The documents which encompass, embody, record or refer to any information regarding the potential to alter, distort, erase or overwrite any data in any device which records data in the vehicle.

The documents which encompass, embody, record or refer to any information regarding which occupant restraint components and sub-components are subject to diagnostic testing by any on board devices.

If you will not make these documents available to me, then do what you have to do.

**R. Douglas Gentile**  
**Douthit Frets Rouse Gentile & Rhodes, LLC**  
**903 E. 104th Street**  
**Suite 610**  
**Kansas City, Missouri 64131**  
**816-941-7600**  
**816-941-6666 (facsimile)**  
**[dgentile@dfrglaw.com](mailto:dgentile@dfrglaw.com)**

***On the web at [www.dfrglaw.com](http://www.dfrglaw.com)***

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